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12 **UNITED STATES BANKRUPTCY COURT**

13 **NORTHERN DISTRICT OF CALIFORNIA**

14 **SAN FRANCISCO DIVISION**

15 **In re:**

16 **PG&E CORPORATION**

17 **-and-**

18 **PACIFIC GAS AND ELECTRIC
COMPANY,**

20 **Debtors**

- 21 Affects PG&E Corporation
22 Affects Pacific Gas and Electric Company
23 Affects both Debtors

24 *All papers shall be filed in the Lead Case,
25 No. 19-30088 (DM)

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**NOTICE OF FILING MOTION OF
OFFICIAL COMMITTEE OF TORT
CLAIMANTS PURSUANT TO
BANKRUPTCY SECTIONS 105(a) AND
107(b) AND BANKRUPTCY RULE 9018
FOR ENTRY OF AN ORDER
AUTHORIZING THE FILING UNDER
SEAL OF THE UNREDACED
DECLARATION OF BRENT C.
WILLIAMS (Related to Dkt. No. 1777)**

Date: May 22, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that on May 15, 2019, the Official Committee of Tort
2 Claimants (the “**TCC**”) filed a motion (the “**Motion**”) pursuant to sections 105(a) and 107(b) of
3 title 11 of the United States Code, Rule 9018 of the Federal Rules of Bankruptcy Procedure, Rule
4 1001-2(a) of the Bankruptcy Local Rules for the United States District Court for the Northern
5 District of California and the *New District Wide Procedures for Electronically Filing Sealed and*
6 *Redacted Documents adopted by the United States Bankruptcy Court for the Northern District of*
7 *California* for entry of an order (i) authorizing the TCC to file under seal the unredacted
8 Declaration (“**Unredacted Declaration**”) of Brent C. Williams in support of the TCC’s Limited
9 Joinder, Objection and Counter Motion to the Wildfire Assistance Program Motion (Dkt. No.
10 1777) filed by PG&E Corp. and Pacific Gas and Electric Company (collectively, the “**Debtors**,”);
11 (ii) directing that the Unredacted Declaration shall remain under seal and confidential and not be
12 made available to anyone without the consent of the TCC and the Debtors or further order from
13 the Court. In support of this Motion, the TCC also filed the Declaration of Brendan J. Murphy
14 contemporaneously therewith.

16 || Dated: May 15, 2019

BAKER & HOSTETLER LLP

By: /s/ Robert A. Julian
Robert A. Julian

Counsel for Official Committee of Tort Claimants